

**U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

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**IN RE: SHERONDA TUCKER  
AND JIMMY TUCKER**

**DEBTORS**

**CASE NO. 23-11270-JDW  
CHAPTER 13**

**RONALD C. ANDERSON,**

**CREDITOR**

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**RESPONSE TO OBJECTION TO PROOF OF CLAIM  
FILED BY RONALD C. ANDERSON [CLAIM #4 OBJECTION #19]**

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Comes now, Creditor, Ronald C. Anderson (hereinafter referred to as “Creditor”), by and through his attorney of record, and files this *Response to Objection to Proof of Claim Filed by Ronald C. Anderson* [19] and in support thereof would state and show unto this Court as follows:

1. On May 12, 2023, Creditor filed a *Proof of Claim* [4] as an unsecured creditor in the amount of \$33,710.00.
2. Creditors claim is based on a Contract for Lease Purchase of Real Estate (the “Lease”) dated August 12, 2017, a true and correct copy of which is attached hereto as **Exhibit “A”**. Said Contract provides as follows:
  - a. The total purchase price was \$75,550.00 with \$550.00 down.
  - b. The balance of \$75,000.00 is owner financed at 10% over 180 months.
  - c. Monthly payments equal \$805.95 per month, commencing September 1, 2017.
  - d. Late fee is \$25.00.
  - e. Debtor to be responsible for house insurance and taxes.

The amortization schedule of the referenced loan is attached hereto as **Exhibit “B”**. The payment summary of Debtor is attached hereto as **Exhibit “C”**.

3. Creditor would show that Debtors have failed to pay the \$400.00 per year homeowners’ insurance since 2018. The current balance due for homeowner’s insurance is \$2,000.00.

4. Creditor would show that Debtors have failed to pay property taxes as follows:

- a. 2017 - \$301.96
- b. 2018 - \$909.12
- c. 2019 - \$900.16
- d. 2020 - \$1,289.12
- e. 2021 - \$1,274.32
- f. 2022 - \$990.17

Total unpaid taxes: \$5,664.85

5. Creditor would further show that Debtors have missed thirty-one (31) monthly payments. The monthly payments are \$805.95 each ( $\$805.95 \times 31 = \$24,984.45$ ) together with a late fee of \$25 ( $\$25 \times 31 = \$775.00$ ). The last payment received was a partial payment in the amount of \$547.15 made on or about March 14, 2022. The balance of unpaid payments and late fees totals \$25,270.25. Therefore, the total balance currently due is \$33,710.10.

WHEREFORE, Creditor prays that the Debtors' Objection to Claim be dismissed, Creditor's Motion for Relief From Automatic Stay be entered, and Creditor allowed to take possession of the property.

Respectfully Submitted,

**BRIDGFORTH, BUNTIN & EMERSON, PLLC**

By: /s/ Barry W. Bridgforth, Jr.  
Barry W. Bridgforth, Jr. (MSB#9797)

/s/Adam Emerson  
Adam Emerson (MSB#102258)

Bridgforth, Buntin & Emerson, PLLC  
5293 Getwell Road  
Southaven, MS 38672  
(662) 393-4450

CERTIFICATE OF SERVICE

I, Barry W. Bridgforth, Jr., hereby certify that I have notified the following interested parties of the Motion for Relief from Automatic Stay as reflected on the foregoing notice to all interested parties and the Chapter 13 Trustee by electronic servicing this, the 12<sup>th</sup> day of July 2023.

**Robert Hudson Lomenick, Jr.**      [robert@northmsbankruptcy.com](mailto:robert@northmsbankruptcy.com)

**U. S. Trustee**  
501 East Court Street, Suite 6-430  
Jackson, MS 39201

/s/ Barry W. Bridgforth, Jr.  
Barry W. Bridgforth, Jr. (MSB#9797)

/s/Adam Emerson  
Adam Emerson (MSB#102258)

## Contract For Lease, Purchase Of Real Estate

Date: 8/12/2017

Total Price: \$75,550.00

Amount Of Down Payment: \$550.00

Amount Financed: \$75,000.00

In consideration of the promises contained herein. The undersigned Lessor and undersigned Lessee do agree to lease unto Jimmy & Sherhonda Tucker the property located at 650 Westlake Dr., Holly Springs, MS 38635.

The Lessee is to pay a Down Payment of \$550.00 and \$400.00 for House Ins. at the time of this agreement and a monthly payment of \$ 805.95 to be paid each consecutive Month beginning Sept. 1, 2017. For a period of 180 Months. (15 Years)

The payment is due on the first day of each Month. If the payment has not been received by the 15th of the Month, a late charge of (\$25.00) will be added to the payment. (Total with Late Fee - \$830.95) House Ins. will be paid to Ronald C. Anderson each year in August.

The Lessee AGREES to pay Half the Property Taxes to Ronald C. Anderson each year starting with the 2017 year Taxes. The Taxes are to be paid by March 1, 2018 and there after the Taxes are to be paid by March 1st of that year, until this agreement ends.

The Property will be Quite Deeded over to Lessee at the end of the 10<sup>th</sup> year if all is in good standing.

If the Lessee DEFAULTS on the agreement. The agreement will become NULL and VOID and there will be NO REFUND. You will vacate the property at the time requested by the Lessor.

LESSEE: Sherhonda Tucker Date: 8/12/2017

Sherhonda Tucker (SSN- 427-SS-67241) (Cell-662-216-3178)

LESSEE: Jimmy Tucker Date: 8/12/2017

Jimmy Tucker (SSN- 587-SS-8869) (Cell-662-306-4004)

Address: 650 Westlake Dr. City: Holly Springs State: MS Zip: 38635

E-mail - Sherhonda + @ gmail . com

### PAYMENTS

(Money Orders Only)

MAILED TO:

LESSOR: Ronald C. Anderson Date: 8/12/2017

Ronald C. Anderson Cell: 901-604-2611

Address: P.O. Box 87 City: Red Banks State: MS Zip: 38661

E-mail - anders6r@aol.com

# Amortization

650 West Lake Drive Holly Springs

No.	Payment Date	Beginning Balance	Payment	Principal	Interest	Ending Balance
29	1/1/2020	\$69,319.89	\$805.95	\$228.29	\$577.67	\$69,091.60
30	2/1/2020	\$69,091.60	\$805.95	\$230.19	\$575.76	\$68,861.41
31	3/1/2020	\$68,861.41	\$805.95	\$232.11	\$573.85	\$68,629.30
32	4/1/2020	\$68,629.30	\$805.95	\$234.04	\$571.91	\$68,395.26
33	5/1/2020	\$68,395.26	\$805.95	\$235.99	\$569.96	\$68,159.26
34	6/1/2020	\$68,159.26	\$805.95	\$237.96	\$567.99	\$67,921.30
35	7/1/2020	\$67,921.30	\$805.95	\$239.94	\$566.01	\$67,681.36
36	8/1/2020	\$67,681.36	\$805.95	\$241.94	\$564.01	\$67,439.42
37	9/1/2020	\$67,439.42	\$805.95	\$243.96	\$562.00	\$67,195.46
38	10/1/2020	\$67,195.46	\$805.95	\$245.99	\$559.96	\$66,949.47
39	11/1/2020	\$66,949.47	\$805.95	\$248.04	\$557.91	\$66,701.43
40	12/1/2020	\$66,701.43	\$805.95	\$250.11	\$555.85	\$66,451.32
41	1/1/2021	\$66,451.32	\$805.95	\$252.19	\$553.76	\$66,199.13
42	2/1/2021	\$66,199.13	\$805.95	\$254.29	\$551.66	\$65,944.83
43	3/1/2021	\$65,944.83	\$805.95	\$256.41	\$549.54	\$65,688.42
44	4/1/2021	\$65,688.42	\$805.95	\$258.55	\$547.40	\$65,429.87
45	5/1/2021	\$65,429.87	\$805.95	\$260.70	\$545.25	\$65,169.16
46	6/1/2021	\$65,169.16	\$805.95	\$262.88	\$543.08	\$64,906.28
47	7/1/2021	\$64,906.28	\$805.95	\$265.07	\$540.89	\$64,641.22
48	8/1/2021	\$64,641.22	\$805.95	\$267.28	\$538.68	\$64,373.94
49	9/1/2021	\$64,373.94	\$805.95	\$269.50	\$536.45	\$64,104.44
50	10/1/2021	\$64,104.44	\$805.95	\$271.75	\$534.20	\$63,832.69
51	11/1/2021	\$63,832.69	\$805.95	\$274.01	\$531.94	\$63,558.67
52	12/1/2021	\$63,558.67	\$805.95	\$276.30	\$529.66	\$63,282.37
53	1/1/2022	\$63,282.37	\$805.95	\$278.60	\$527.35	\$63,003.77
54	2/1/2022	\$63,003.77	\$805.95	\$280.92	\$525.03	\$62,722.85
55	3/1/2022	\$62,722.85	\$805.95	\$283.26	\$522.69	\$62,439.59
56	4/1/2022	\$62,439.59	\$805.95	\$285.62	\$520.33	\$62,153.96
57	5/1/2022	\$62,153.96	\$805.95	\$288.00	\$517.95	\$61,865.96
58	6/1/2022	\$61,865.96	\$805.95	\$290.40	\$515.55	\$61,575.55
59	7/1/2022	\$61,575.55	\$805.95	\$292.82	\$513.13	\$61,282.73
60	8/1/2022	\$61,282.73	\$805.95	\$295.26	\$510.69	\$60,987.46
61	9/1/2022	\$60,987.46	\$805.95	\$297.72	\$508.23	\$60,689.74
62	10/1/2022	\$60,689.74	\$805.95	\$300.21	\$505.75	\$60,389.53
63	11/1/2022	\$60,389.53	\$805.95	\$302.71	\$503.25	\$60,086.83
64	12/1/2022	\$60,086.83	\$805.95	\$305.23	\$500.72	\$59,781.60
65	1/1/2023	\$59,781.60	\$805.95	\$307.77	\$498.18	\$59,473.82
66	2/1/2023	\$59,473.82	\$805.95	\$310.34	\$495.62	\$59,163.48
67	3/1/2023	\$59,163.48	\$805.95	\$312.92	\$493.03	\$58,850.56
68	4/1/2023	\$58,850.56	\$805.95	\$315.53	\$490.42	\$58,535.03
69	5/1/2023	\$58,535.03	\$805.95	\$318.16	\$487.79	\$58,216.86

DATE  
3-14-22  
Paid

31 months Behind \$25,270.25

Short  
\$285.80  
Amount

Jimmy & Sherlonda Tucker

Property: 650 West Lake Dr. Holly Springs, Mississippi

Lease commencement date: 9/1/2017

House Ins	\$	2,000.00	Taxes	
Taxes	\$	5,664.85	\$	990.17
3/14/22 shortage	\$	285.80	\$	1,274.32
31 mo \$805.95 ea	\$	24,984.45	\$	1,289.12
Late fees \$25 per mo late x 31	\$	775.00	\$	900.16
	\$	33,710.10	\$	909.12
			\$	301.96
			\$	5,664.85

EXHIBIT "C"



## Jimmy & Sherhonda Tucker

650 West Lake DR.

Holly Springs, MS 38635

Contract Date - 8/12/2017 - 15 Years (180 Months)

House Insurance - \$400.00

Down Payment - \$500.00

House Payment Amount - \$805.95

Date	Payment	Date Paid	Balance To Pay	Date Balance Paid
9/1/2017	\$705.95	9/18/17	-\$100.00	10/18/17
10/1/2017	805.95	10/18/17	N/A	N/A
11/1/2017	831.00	11/22/17	+25.05	11/22/17
12/1/2017	830.00	12/29/17	+24.05	12/29/17
1/1/2018	805.95	2/28/18	N/A	N/A
2/1/2018	805.95	2/28/18	N/A	N/A
3/1/2018	854.05	2/28/18	+48.10	2/28/18
4/1/2018	831.00	4/16/18	+25.05	4/16/18
5/1/2018	400.00	10/28/18	-405.95	3/4/18
6/1/18	805.95	3/4/19	N/A	N/A
7/1/18	588.10	3/4/19	-217.85	5/30/19
8/1/2018	581.15	5/30/19	-224.80	8/19/19
9/1/2018	175.20	8/19/19	-630.75	9/17/19
10/1/18	169.25	10/11/19	-636.70	12/6/19
11/1/2018	103.30	2/27/20	-702.65	2/27/20
12/1/2018	897.35	2/27/20	+91.40	N/A
1/1/2019	805.95	4/20/20	+494.05	4/27/20
2/1/2019	805.95	5/29/20	N/A	N/A
3/1/2019	805.95	6/11/20	N/A	N/A
4/1/2019	805.95	8/2/20	N/A	N/A
5/1/2019	990.25	8/2/20	+184.30	N/A
6/1/2019	805.95	8/14/20	N/A	N/A
7/1/2019	805.95	9/18/20	-27.60	4/6/21
8/1/2019	805.95	4/6/21	N/A	N/A
9/1/2019	805.95	4/6/21	+360.50	4/26/21
10/1/2019	805.95	5/7/21	N/A	N/A
11/1/2019	805.95	6/11/21	+148.60	10/1/21
12/1/2019	850.95	10/1/21	N/A	N/A
1/1/2020	850.95	10/1/21	+491.70	12/3/21
2/1/2020	850.95	12/3/21	+240.75	12/3/21
3/1/2020	850.95	12/3/21	N/A	N/A
4/1/2020	400.00	12/17/21	-485.95	2/12/22
5/1/2020	805.95	2/12/22	+232.10	2/12/22
6/1/2020	805.95	3/11/22	+226.15	3/11/22
7/1/2020	805.95	4/1/2022	+220.20	10/19/22
8/1/2020	805.95	10/19/22	+14.25	1/27/23
9/1/2020	739.30	1/27/23	-18.55	3/14/23
10/1/2020	481.45	3/14/23	-324.50	3/14/23

EXHIBIT "C"